

Abraham Fruchter & Twersky LLP

One Penn Plaza, Suite 2805
New York, NY 10119
Tel : (212) 279-5050
Fax: (212) 279-3655
www.aftlaw.com

MEMO ENDORSED

By Hand

Honorable Richard M. Berman
United States District Judge
U. S. District Court, Southern District of New York
500 Pearl Street
Room 650
New York, N.Y. 10007

Re: In re Worldspace Sec. Litig., Case Nos.: 1-07-cv-02252 (RMB), 1-07-cv-02355 (RMB); 1-07-cv-02399 (RMB); 1-07-cv-02400 (RMB); 1-07-cv-03109 (RMB)

June 27, 2007

August 9, 2007 is fine for submission of complaint.

Conference (mandatory + final) is adjourned to 8/21/07

⑨ 9:15 A.M. lead counsel had better start leading.

SO ORDERED:

Richard M. Berman
6/27/07 Richard M. Berman, U.S.D.J.

Dear Judge Berman:

We are plaintiffs' lead counsel in the above consolidated actions, and submit this letter on behalf of all parties regarding certain scheduling matters.

On May 22 and May 24, 2007, prior to the appointment of lead plaintiff and lead counsel by Your Honor, the Court entered Orders providing defendants with sixty days to respond to a consolidated complaint, but they did not provide for a date for submission of such complaint. After discussing the matter with defendants' counsel, we respectfully request that plaintiffs have forty-five days to submit a consolidated complaint or until August 9, 2007.

In addition, a status/scheduling conference has been set by the Court for Tuesday, July 3, 2007 at 10:30 a.m. Defendants inform me that they are unavailable on that date and request that such conference be adjourned. Moreover, as the Private Securities Litigation Reform Act of 1995 is applicable to this action, discovery is stayed during the pendency of defendants' likely motions to dismiss. Thus, the parties respectfully request that the status/scheduling conference be adjourned until after the Court has ruled on any motions to dismiss.

If Your Honor wishes to discuss this matter, we are available at the Court's convenience.

Respectfully,

Lawrence D. Levitt
Lawrence D. Levitt

cc: Jamie A. Levitt, Esq.
Maite Aquino, Esq.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/28/07

RECEIVED
JUN 27 2007
CHAMBERS OF
RICHARD M. BERMAN
U.S.D.J.